

**IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA

V.

SOLOMAN JEROME MCWILLIAMS

Case No. 2:05CR302-WHA

United States' Motion for Downward Departure for Acceptance of Responsibility

The United States moves this Court to reduce Solomon Jerome McWilliams's offense level by one-level based on McWilliams's acceptance of responsibility. As grounds for this Motion, the United States notes:

1. A Grand Jury sitting in the Middle District of Alabama returned an indictment against McWilliams on December 14, 2005.

2. On June 14, 2006, McWilliams notified the United States of his intent to plead guilty. Given the circumstances and difficulties with this particular case, this was sufficiently early to permit the Government to avoid preparing for trial and to allocate its resources efficiently. McWilliams pleaded guilty to the Indictment on June 19, 2006.

3. Therefore, under United States Sentencing Guidelines § 3E1.1(b), the United States makes this formal motion for a one-level reduction in McWilliams's offense level for acceptance of responsibility so that he shall receive a total reduction for acceptance of responsibility of three-levels.

Respectfully submitted this the 24th day of August, 2006.

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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following: Kevin L. Butler.

/s/ Christopher Snyder
CHRISTOPHER A. SNYDER
Assistant United States Attorney